

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRANDON W. SCHROTH,

Defendant.

MAGISTRATE CASE NO.

12MJ0748

COMPLAINT FOR VIOLATION OF:

Title 18 U.S.C. § 2251(a), (c), (e) -
Sexual Exploitation of a Child

The undersigned Complainant, being duly sworn, states:

Count 1

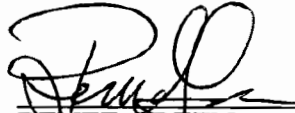
In or about and between December 18, 2010 and December 26, 2010, within the Southern District of California, and elsewhere, defendant BRANDON W. SCHROTH did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct outside the United States, which visual depiction was transported into the United States by any means or facility of interstate or foreign commerce; in violation of Title 18 United States Code, Sections 2251(c) and (e).

Count 2

In or about and between December 26, 2010 and July 16, 2011, within the Southern District of California, defendant BRANDON W. SCHROTH did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means and transported using any means or facility of interstate commerce and in and affecting interstate and foreign commerce; in violation of Title 18 United States Code, Sections 2251(a) and (e).

Jun 3/1/12

1 And the complainant states that this complaint is based on the attached Statement of Facts
2 incorporated herein by reference.

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4 
5 RENE GREEN
6 Special Agent, FBI

7 Sworn to me and subscribed in my presence this 1 day of March, 2012.

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10 UNITED STATES MAGISTRATE JUDGE
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STATEMENT OF PROBABLE CAUSE

In July and August of 2011, two federal search warrants were executed at the residence in Denver, Colorado of a suspected distributor of child pornography. Several items of evidence, including computers and digital media, were seized and forensically analyzed pursuant to the search warrants. During the analysis of the digital media, images were discovered, which depicted BRANDON W. SCHROTH and another adult male with three minor females. The images depicted BRANDON W. SCHROTH and the adult male wrestling and posing with the three minor females on a mattress. In some of the images the girls were fully clothed and in others they were wearing undergarments. In four of the images, BRANDON W. SCHROTH's hand was visible, pulling back the shirt of one of the minor females, and touching and exposing her breasts while she slept.

A federal search warrant was executed on December 6, 2011, at BRANDON W. SCHROTH's residence, located at 6888 Friars Road, Apartment #413, San Diego, California. BRANDON W. SCHROTH was advised of his Miranda rights, waived the same, and participated in an interview. BRANDON W. SCHROTH identified the other adult male pictured with the three minor females, and admitted it was his own hand depicted in the images pulling back the shirt of one of the minor females and touching and exposing her breasts while she slept. Several items of evidence, including computers and digital media, were seized and forensic analysis pursuant to the search warrant is ongoing.

Inquiries made to the Department of Homeland Security have revealed that BRANDON W. SCHROTH took a flight from San Diego, California to Detroit, Michigan, then continued to Frankfurt, Germany, on December 18, 2010. BRANDON W. SCHROTH returned to the United States on a flight from Frankfurt, Germany to Atlanta, Georgia, on December 26, 2010. Military records for BRANDON W. SCHROTH also confirm he reported he would be staying at an address in Langmeil, Germany during that period of time. Military records also confirmed that the mother of two minor females, C.E.B. (DOB: 2/6/01) and C.M.B. (DOB: 3/14/02), was an active duty Air Force member, assigned to Ramstein Air Base, approximately 80 miles southwest of Frankfurt, Germany, at that time.

During the analysis of the evidence seized in the case in Denver, several images were located in a digital folder entitled "Brandon", which depicted the two minor females, C.E.B. and C.M.B. In an

1 image entitled, "Cyan.jpg", the minor female C.E.B., is depicted standing in a blue shirt and gray pants
2 in the living room of a residence. The metadata associated with the image indicates that the digital image
3 was taken on December 19, 2010, with a Canon EOS Rebel T1i camera. Two additional files, entitled
4 "IMG_1638" and "IMG_1639", contain still images of the minor female C.E.B., wearing the same
5 clothing and standing next to a suitcase in the same room; however, the metadata associated with those
6 images has been removed. Four additional files, entitled "IMG_1783", "IMG_1882", "IMG_1888" and
7 "IMG_1908", are still image files depicting the minor females C.E.B. and C.M.B., clothed in various
8 locations. The metadata associated with those four files has also been removed. Three additional still
9 image files, entitled "IMG_2646", "IMG_2650" and "IMG_3084", depict the minor female C.M.B.
10 clothed and on the floor of a residence. The metadata associated with those three images indicate that
11 the digital photographs were taken on December 25, 2010, with a Canon EOS Rebel T1i camera.

12 Seven video files were located in the "Brandon" folder alongside the still images described above.
13 The video files were entitled "1771edit.mp4", "cum on cynthia butt.mov", "cynthia and cyan bath body
14 wash.wmv", "MVI_0012.avi", "MVI_12.avi", "MVI_1496.avi", "MVI_1497.avi", and "MVI_1756.avi".
15 The video file entitled "cynthia and cyan bath body wash.wmv" is a video, approximately 4:21 minutes
16 long, in which BRANDON W. SCHROTH is depicted naked in a bathtub with minor females C.E.B. and
17 C.M.B., also naked. BRANDON W. SCHROTH can be seen rubbing soap all over the girls' bodies,
18 including inside the labia of both girls. BRANDON W. SCHROTH positions the girls so they are
19 exposed to the camera from their necks to their knees, with only occasional glimpses of their faces.
20 BRANDON W. SCHROTH asks one of the girls to wash his penis, which she does. BRANDON W.
21 SCHROTH is then depicted holding the girl against his naked body for a period of time before they exit
22 the bathtub. BRANDON W. SCHROTH then dries off the girl outside the tub and uses his bare hands
23 to caress her nipples. The girl then says she wants to get dressed and leaves the bathroom.

24 Several images were located on the computer seized in Denver depicting another pre-pubescent
25 minor female, A.A. (DOB: 9/16/02), inside the aforementioned San Diego residence of BRANDON W.
26 SCHROTH. Two images, entitled "IMG_6559.jpg" and "edit IMG_6558.jpg", depict a close-up image
27 of the shirtless chest the minor female, A.A., located in the living room of BRANDON W. SCHROTH's
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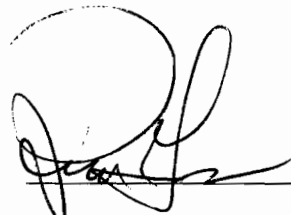
1 San Diego apartment. Both image files appear to have been created on the questioned computer on May
2 1, 2011.

3 In addition, the following images of the minor female, A.A., were also discovered, and are
4 described as follows:

- 5 1. "100_0400.jpg" - A.A. is depicted standing in BRANDON W. SCHROTH's bedroom
6 wearing only underpants, and visible only from her neck to her knees;
- 7 2. "100_401.jpg" - A.A.'s naked torso is depicted in BRANDON W. SCHROTH's bedroom;
- 8 3. "100_406.jpg" - A.A. is depicted from her back side, standing in BRANDON W.
9 SCHROTH's bedroom wearing only underpants, and is visible only from her mid-back to her
10 knees;
- 11 4. "100_407.jpg" - A.A. is depicted from her back side, standing in BRANDON W.
12 SCHROTH's bedroom wearing only underpants that are partially inserted between her
13 buttocks, and is visible on from her lower back to her knees;
- 14 5. "100_409.jpg" - A.A. is depicted naked, standing and leaning forward, in BRANDON W.
15 SCHROTH's bedroom. She is visible from her neck to her thighs, with a white, milky
16 substance that appears to be ejaculate running down her chest and torso.
- 17 6. "100_410.jpg" - A.A. is depicted naked, standing in BRANDON W. SCHROTH's
18 bedroom. She is visible from her neck to her ankles, with a white, milky substance that
19 appears to be ejaculate running down her chest and torso.

20 All of the described images appear to have been created on the Denver suspect's computer on July 16,
21 2011, meaning that the Denver suspect saved these images on or about that date.

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RENEE GREEN
Special Agent, FBI